UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

RUDY J. ZABALA and JOSE FRANCISCO ZABALA, and on behalf of themselves and others similarly situated,

Plaintiff,

No. 17-cv-4944 (SJF)(SIL)

- against -

NOTICE OF MOTION

HORIZON CONSULTING NY, INC., BLUE DIAMOND MANAGEMENT, RAVINDER CHOPRA, an individual SHALU SURI, an individual, SUSHIL K. GOYAL, an individual, NILESH PATEL, an individual, MANOJ A. NARANG, an individual, and RANJU NARANG, an individual

Defendant(s).

MOTION BY LEVINE & BLIT, PLLC, TO WITHDRAW AS COUNSEL FOR PLAINTIFFS, AND TO FILE SUPPORTING DELCARATIONS UNDER SEAL

Pursuant to New York Rules of Professional Conduct 1.16(c)(8), LEVINE & BLIT, PLLC ("L&B"), including attorneys Russell S. Moriarty, Esq., Justin S. Clark, Esq., and Matthew J. Blit, Esq., moves this Court for an Order granting permission to withdraw as counsel to plaintiffs RUDY J. ZABALA and JOSE FRANCISCO ZABALA.

L&B also respectfully requests that it be permitted to file supporting Declarations under seal, allowing for the Court's *in camera* review, but denying review of the contents by defendants so as not to prejudice plaintiffs in any respect.

Dated: October 2, 2018

New York, New York

LEVINE & BLIT, PLLC

Russell S. Moriarty (RM 0224)

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To:

Plaintiffs (via First Class Mail) Cardenas & Islam, co-counsel for plaintiffs (via Email) All Defendants (via ECF)